

FILED
Clerk
District Court

AUG 15 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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5 **Attorneys for Plaintiffs Elenita A. Santos and Angel C. Santos**

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN MARIANA ISLANDS**

10 **ELENITA A. SANTOS and) CIVIL CASE NO. 04-0030**
11 **ANGEL C. SANTOS,)**
12 **Plaintiffs,) PLAINTIFFS' EXPERT WITNESS**
13 **vs.) DISCLOSURE**
14 **HONGKONG ENTERTAINMENT)**
15 **(OVERSEAS) INVESTMENTS LIMITED)**
16 **dba TINIAN DYNASTY HOTEL &)**
17 **CASINO, and CENTURY INSURANCE)**
18 **CO. LIMITED,)**
19 **Defendants.)**

20 Plaintiffs Elenita A. Santos and Angel C. Santos, by and through counsel and pursuant to
21 Fed.R.Civ.P. 26(a)(2), provides the following disclosure setting forth information about the
22 people whose expert opinions Plaintiffs may offer in evidence at trial.

23 1) Benchmark Medical Consultants by and through John L. Chase, M.D., F.A.C.S.
24 a. 10423 Old Placerville Road
25 Suite 100
26 Sacramento, CA 95827
27 Tel: (916) 920-2272
28 Fax: (916) 920-2515

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- b. The report prepared by Dr. Chase and attached hereto as "Exhibit A" contains a complete statement of all opinions to be expressed. The basis and reasons therefore, the data or other information considered by Dr. Chase in forming his opinions and any exhibits to be used as a summary of or support for his opinions are contained in the medical records of Mrs. Santos, copies of which have previously been provided to Defendants.
- c. The curriculum vitae and schedule of fees of Dr. Chase, attached hereto as "Exhibit B" contains Dr. Chase's qualifications, including a list of all publications authored by him within the preceding ten years, the compensation to be paid for the study and testimony and a listing of any other cases in which Dr. Chase has testified as an expert at trial or by deposition within the preceding four years.

2) Pamina J. Hofer, Ph.D.

a. P.O. Box 5208
University of Guam Station
Mangilao, GU 96923
Tel: (671) 734-0832
Fax: (671) 734-0393

- b. The report prepared by Dr. Hofer and attached hereto as "Exhibit C" contains a complete statement of all opinions to be expressed, the basis and reasons therefore, the data or other information considered by Dr. Hofer in forming her opinions and any exhibits to be used as a summary of or support for his opinions.
- c. The curriculum vitae and schedule of fees of Dr. Hofer, attached hereto as "Exhibit D" contains Dr. Hofer's qualifications, including a list of all publications authored by her within the preceding ten years, the compensation to be paid for the study and testimony and a listing of any other cases in which Dr. Hofer has testified as an expert at trial or by deposition within the preceding four years.

3) Marc A. Firestone, Ph.D.

a. 300 Esplanade Drive
Suite 1180
Oxnard, CA 93096
Tel: (805) 308-7123

- b. The report prepared by Dr. Firestone and attached hereto as "Exhibit E" contains a complete statement of all opinions to be expressed, the basis and reasons therefore, the data or other information considered by Dr. Firestone in forming his opinions, the compensation to be paid for the study, any exhibits to be used as a summary of or support for his opinions Dr. Firestone's qualifications, including a list of all publications authored by him within the preceding ten years and testimony and a listing of any other cases in which Dr. Firestone has testified as an expert at trial or by deposition within the preceding four years.
- c. The curriculum vitae of Dr. Firestone, attached hereto as "Exhibit F" contains Dr. Firestone's qualifications.

4) Grant Thornton, by and through Roger D. Slater, MBA, CPA

a. Dhonson Plaza, Suite B
790 Marine Corps. Drive
Tamuning, GU 96913
Tel: (671) 649-3800
Fax: (671) 687-6711

b. Mr. Slater will be asked to testify as to the economic impact to Mrs. Santos caused by future medical treatment, the nature and extent of which has yet to be determined.

c. The curriculum vitae and schedule of fees of Mr. Slater, attached hereto as "Exhibit G" contains Mr. Slater's qualifications, including a list of all publications authored by him within the preceding ten years, the compensation to be paid for the study and testimony and a listing of any other cases in which Mr. Slater has testified as an expert at trial or by deposition within the preceding four years.

5) Any and all individuals designated as experts by any other party, notwithstanding subsequent to such designation, any such party may be dismissed from the case and/or cancels such person's designation.

27 6) Plaintiffs reserve all of its rights pursuant to Fed.R.Civ.P.26 and under the laws
28 of the Commonwealth of the Northern Mariana Islands to supplement, revise or withdraw or add

1 hereto especially as Plaintiffs have yet to depose Defendants or see Defendants' proposed
2 experts.

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4 Since discovery in this action has not yet been completed and depositions of experts have
5 not yet been taken or completed, Plaintiffs expressly reserve the right to name or call additional
6 experts as the need arises during the course of discovery and investigation in preparation for trial
7 of this matter, and after Defendants disclose their experts and theories and the facts upon which
8 they base such theories.

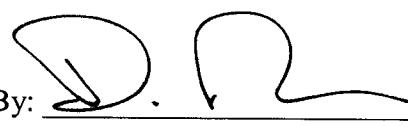
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11 Timely notice of such supplemental experts will be provided pursuant to Fed.R.Civ.P. 26
12 and such witnesses will be made available for the purpose of being deposed prior to trial in this
13 action.

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16 Plaintiffs further reserve the right to consult with and retain the services of additional
17 expert witnesses to testify on their behalf at trial for the purposes of impeachment and/or
18 rebuttal testimony.

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20 Dated: August 15, 2005.

O'CONNOR BERMAN DOTT & BANES

21
22 Attorney for Plaintiffs Elenita A. Santos and
23 Angel C. Santos

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25 By: 

26
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28 David G. Banes